

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF PUERTO RICO**

IVETTE M. MARTÍNEZ GONZÁLEZ, ET AL.,  
Plaintiffs

vs.

CATHOLIC SCHOOLS OF THE  
ARCHDIOCESES OF SAN JUAN PENSION  
PLAN, ET AL.,  
Defendants

CIVIL No. 16-2077 (GAG)

---

NORMA CARDOZA ESTREMER, ET AL.,  
Plaintiffs

vs.

COLEGIO PADRE BERRIOS, ET AL.,  
Defendants

---

CIVIL NO. 16-2318

---

**MOTION FOR EXTENSION OF TIME TO FILE A DISPOSITIVE  
MOTION AS TO THE CHURCH PLAN EXEMPTION**

**TO THE HONORABLE COURT:**

**COMES NOW** Plaintiffs Norma Cardoza and Candida Perez, through the undersigned counsel, and very respectfully state and pray as follows:

1. On March 30, 2017, this Honorable Court entered an *Order* indicating that the deadline to file dispositive motions as to the Church Plan Exemption was set for November 20, 2017. *See, Docket No. 113.*

2. Notwithstanding this attorney efforts to comply with this schedule once the case consolidated, it was impossible to complete and file such motion within the period of time scheduled by the Court.

3. Therefore, Plaintiffs request an extension of time of thirty (30) days, until December 20, 2017, to file a dispositive motion as to the Church Plan Exemption in this case.

**WHEREFORE**, the undersigned counsel respectfully requests this Honorable Court that for the reason stated here above grants the extension of time of thirty (30) days, until December 20, 2017.

**RESPECTFULLY SUBMITTED.**

In San Juan, Puerto Rico, this 20<sup>th</sup> of November of 2017.

**IT IS HEREBY CERTIFIED** that on this same date a true and exact copy of the foregoing was filed electronically with the Clerk of the Court via the CM/ECF system, which will send notification of such filing to all attorneys of record.

s/ Luis Vivaldi Oliver  
**Luis Vivaldi Oliver Law Offices**  
U.S.D.C.P.R 214413  
Attorney for Plaintiffs  
P.O. Box 191340  
San Juan, P.R 00919  
Tel. (787) 413-2218  
Fax. (939) 277-1126  
vivaldipension@hotmail.com